

EXHIBIT 15

LONNIE THOMPSON
5/4/2021

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

HUNTERS CAPITAL, LLC, et al.,)	
)	
Plaintiffs,)	
)	
vs.)	No. 20-cv-00983-TSZ
)	
CITY OF SEATTLE,)	
)	
Defendant.)	

Zoom 30(b)6 Video Deposition Upon Oral Examination
Of
LONNIE THOMPSON

DATE: Tuesday, May 4, 2021

REPORTED BY: Mindy L. Suurs, CSR No. 2195

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1 in preparation for today?

2 A. No.

3 Q. So other than studying those documents, did you
4 do any other form of preparation for your deposition?

5 A. No.

6 Q. Who's your current employer?

7 A. I am the owner of Bergman's Lock and Key.

8 Q. How long have you owned Bergman's?

9 A. Over 13 years.

10 Q. Where did you work before you started Bergman's?

11 A. I worked for Bergman's -- I've worked for
12 Bergman's Lock and Key for over 20 years, and I was
13 employed with Mr. Bergman and then purchased the company
14 later on.

15 Q. So before you owned the company, when you worked
16 for it, what was your role?

17 A. I was the lead locksmith.

18 Q. And was Bergman's your first locksmith job?

19 A. Yes.

20 Q. So you said you purchased Bergman's approximately
21 13 years ago; is that correct?

22 A. Yes.

23 Q. But the company existed prior to you purchasing
24 it; is that correct?

25 A. That is correct.

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1 or no?

2 A. No, I did not.

3 Q. So you didn't text any of your employees related
4 to the protests?

5 A. No, the only texting that would have been done
6 would have been, "Don't bother coming to the shop, I'll get
7 this to you this way or coast is clear, things are looking
8 good" kind of thing. It was more directed to what's
9 happening right there at the shop.

10 Q. So you may have texted about the situation around
11 the shop during the CHOP time period; is that right?

12 A. But it wouldn't be of any relevance. You know
13 what I mean? Would have been, "Shop's open, don't worry
14 about it" kind of thing. It was all about our safety to
15 each other, or for each other.

16 Q. Do you delete your texts, or do you still have
17 them?

18 A. I'm not a very savvy phone user, and I know I've
19 already lost two phones in the last year.

20 Q. When you lose a phone, do you lose all of the
21 information that was on the last one?

22 A. Unless my son is able to get it for me, you are
23 correct, I would have lost them.

24 Q. Have you checked to see whether you have any
25 texts from the time period of the CHOP, June to July of

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1 2020?

2 A. I think I did check a while back when I was asked
3 about it, and I think I -- actually, I know I did. I
4 checked a while back to see if I had anything and I don't.

5 Q. Do you remember if you had texts from that time
6 period at all?

7 A. I would have got it to everybody here as they
8 needed it.

9 Q. Do you remember if you still have any texts from
10 that time period at all?

11 A. No, I do not.

12 Q. No, you don't remember or no, you don't have
13 them?

14 A. No, I do not have texts from back then.

15 Q. Okay. So you know that they're gone?

16 A. I'm 90 percent sure they're gone.

17 Q. Okay. When did you lose phones in the last two
18 years?

19 A. My first one I lost in Lake Washington, and that
20 was in October before I put the boat away for the year, and
21 the last one I lost was in January, and that was when we
22 were up in the mountains hiking.

23 Q. Were you able to recover the phone that dropped
24 in the lake?

25 A. No. No.

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1 Q. Did you see it fall, or what were the
2 circumstances?

3 A. I jumped in the water because I was playing with
4 my kids and it was in my front pocket, and when I dove
5 in --

6 Q. Waterlogged?

7 A. I don't know. Haven't seen it since.

8 Q. Oh. How about in January? What happened to your
9 phone then?

10 A. I have no idea. It had to have come out of the
11 back pocket of my backpack and we were hiking high in the
12 snow and by the time I realized it was gone, it was way too
13 late.

14 Q. You did provide us some photos, but I didn't see
15 any photos related to your business. Do you have any
16 photos that show your business or the CHOP zone during June
17 and July of 2020?

18 A. I don't recall providing photos. I may have had
19 a coworker that did, but I don't recall providing any from
20 me. There was the young -- the gentleman that was chased
21 out of the park with a baseball bat, and he would have been
22 the only one that I know of that would have photos. But I
23 don't recall of any photos in our -- yeah, I don't recall
24 of any photos.

25 Q. Who was the gentleman who was chased out with the

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1 I, Mindy L. Suurs, the undersigned Certified Court
2 Reporter, pursuant to RCW 5.28.010, authorized to
3 administer oaths and affirmations in and for the State of
4 Washington, do hereby certify:

5 That the foregoing testimony of LONNIE THOMPSON
6 was given before me at the time and place stated therein
7 and thereafter was transcribed under my direction;

8 That the sworn testimony and/or proceedings were by me
9 stenographically recorded and transcribed under my
10 supervision, to the best of my ability;

11 That the foregoing transcript contains a full, true,
12 and accurate record of all the sworn testimony and/or
13 proceedings given and occurring at the time and place
14 stated in the transcript;

15 That the witness, before examination, was by me duly
16 sworn to testify the truth, the whole truth, and nothing
17 but the truth;

18 That I am not a relative, employee, attorney, or
19 counsel of any party to this action or relative or employee
20 of any such attorney or counsel and that I am not
21 financially interested in the said action or the outcome
22 thereof;

23 DATE: May 6, 2021
24
25

Mindy L. Suurs

Mindy L. Suurs
Certified Court Reporter #2195




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1 I declare that I have read my within deposition,
2 taken on Tuesday, May 4, ~~2016~~²⁰²¹, and the same is true and
3 correct save and except for changes and/or corrections, if
4 any, as indicated by me on the "CORRECTIONS" flyleaf page
5 hereof.

6 Signed in Seattle, Washington,
7 this 17th day of May, ~~2016~~ 2021

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11 
12 LONNIE THOMPSON
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24 REPORTER'S CERTIFICATE
25

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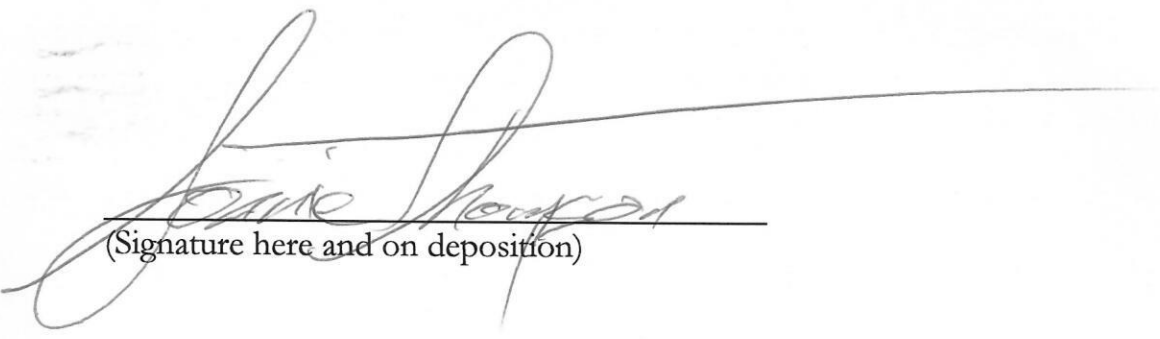
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Please record any changes or corrections on this sheet, indicating page number, line number, and reason for the change.

Page Line

Correction and Reason


(Signature here and on deposition)